

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CURLING PLAINTIFFS' NOTICE OF RELEVANT AUTHORITIES**

Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the “Curling Plaintiffs”) identify the following authorities for the Court’s consideration in evaluating State Defendants’ work product protection claim asserted in Dkt. 838, which Curling Plaintiffs respectfully submit support disclosure of the Fortalice report at issue per the arguments made during the August 31, 2020 conference with the Court:

*In re Capital One Consumer Data Sec. Breach Litig.*, No. 1:19MD2915 (AJT/JFA), 2020 WL 2731238, at \*6 (E.D. Va. May 26, 2020), *aff’d*, No. 1:19MD2915 (AJT/JFA), 2020 WL 3470261 (E.D. Va. June 25, 2020).

*In re Dominion Dental Servs. USA, Inc. Data Breach Litig.*, 429 F. Supp. 3d 190 (E.D. Va. 2019).

*In re Premera Blue Cross Customer Data Sec. Breach Litig.*, 296 F. Supp.  
3d 1230 (D. Or. 2017).

Dated: August 31, 2020

Respectfully submitted,

/s/ David D. Cross

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross

David D. Cross

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2020, a copy of the foregoing **CURLING PLAINTIFFS' NOTICE OF RELEVANT AUTHORITIES** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross  
David D. Cross